

Message

From: Harlow, David [harlow.david@epa.gov]
Sent: 12/22/2018 12:02:36 AM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]; Gunasekara, Mandy [Gunasekara.Mandy@epa.gov]; Woods, Clint [woods.clint@epa.gov]; Dominguez, Alexander [dominguez.alexander@epa.gov]
CC: Schwab, Justin [Schwab.Justin@epa.gov]
Subject: FW: OOOOa
Attachments: QuadOaNPRM.docx

FYI and awareness, and by way of a status report on where we stand on the revisions to the draft OOOOa “policy package” NPRM.

Clint, I’m sorry I missed you. I was somewhat tardy in returning to the office from my errand. I wish you and Amy (and little Lucy as well, of course) a merry Christmas and a happy New Year. Meanwhile, for your particular purposes, take a look at the sentence that is at the bottom page 64 and which continues onto to top of page 65 (“On the other hand, the EPA has to date assumed that methane, if subjected to a standard of performance for new sources, would trigger application of section 111(d). Accordingly, given this assumption . . .”). It is there that, as I envisioned it – having for this purpose revised the original draft text, which had read “On the other hand, it is clear that methane, if subjected to a standard of performance . . .” – you might find an opportunity to, say, drop a (lengthy?) footnote (*i.e.*, the “Woods footnote,” surpassing the “Baptist memo” and the “Schwab footnote” in eponymous notoriety) in which you could work some methane “precursor” magic.

Mandy and Alex, should you happen to see this email, for you two as well I wish you and your families a merry Christmas and a happy New Year.

As the year draws to a close, I find it difficult to get my head around the reality that so much of my time here has passed already, as if in a blur. The singular thing that stand out clearly, however, is how much I enjoy working with each of you. In this respect, I couldn’t be more blessed.

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From: Harlow, David
Sent: Friday, December 21, 2018 6:31 PM
To: Cozzie, David <Cozzie.David@epa.gov>
Cc: Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>
Subject: RE: OOOOa

David,

Attached, at long last, is the draft OOOOa NPRM, as I've sought to revise it to reflect Bill's thinking and direction. My apologies for taking so long to get this turned around and, for that matter, getting it to you so late in the day.

In sending it to you, I did want to re-up the admonition that it is certainly not Bill's expectation or intention that you or anybody else there crater any holiday plans, sacrifice any leave, or anything along those lines, in order to work on this thing. I had presumed that to be Bill's view of the matter yesterday, and today Bill affirmed that to me directly. The New Year will be here soon enough.

I wish you and yours (and Peter, you and yours as well) an enjoyable holiday and a happy – and what I suspect will be a challenging but also, hopefully, a rewarding New Year.

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From: Cozzie, David
Sent: Friday, December 21, 2018 2:41 PM
To: Harlow, David <harlow.david@epa.gov>
Subject: RE: OOOOa

David,

Thanks for the update. I will keep my eye open for it and plan on circling with you after the New Year.

Happy Holidays!

David

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From: Harlow, David
Sent: Thursday, December 20, 2018 5:18 PM
To: Cozzie, David <Cozzie.David@epa.gov>
Subject: OOOOa

David,

I've owed you a further status report on the OOOOa draft NPRM, but in talking with Peter earlier today, when he was still here, I learned that he's already given you something of a heads-up on where things now stand and how are looking to proceed.

I'm hoping to get you the draft, as Bill and I propose to revise it, before I leave for the day tomorrow . . . yes, the Friday evening before Christmas week. From my own perspective, there's no actual practical purpose in getting it out then, since Bill certainly doesn't expect, nor would he want, you or anybody else there to take that as a sign that somebody there should be working on it during Christmas week. My own singular motive for passing it along by then (assuming I even accomplish that) would be to clear it off my desk. As it is, Bill is planning (or, at least, hoping) to take all of Christmas week and all of the following week off. I'm planning on coming in on the 27th and the 28th, but with the intention of using that quiet time to do some writing on something *other* than the OOOOa draft that I've really been wanting to finish.

At some point early in the New Year, at some mutually convenient time, we can get together on the phone to talk about what we've done with the draft and where Bill's thinking is on it. Bill does realize that, what with the changes we're proposing to make, there's going to be more time needed for not only your folks, but also OGC, to process the direction we're proposing to go and the arguments we're proposing to make in support of that direction.

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